

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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LACONIA PROPERTIES LLC.,

Plaintiff,

Index No. 07 CV 6220 (LAP)

-against-

RULE 26 DISCLOSURE

TRAVELERS PROPERTY CASUALTY COMPANY
OF AMERICA a/k/a ST PAUL TRAVELERS
INSURANCE COMPANY,

Defendants.

=====X

Plaintiff, LACONIA PROPERTIES LLC., through their attorneys, ***NESCI KEANE
PIEKARSKI KEOGH & CORRIGAN, ESQS.***, submits as and for an initial disclosure pursuant to
Fed. R. Civ. P. 26 (a)(1) as follows:

A. Individuals likely to have discoverable information which Plaintiff may use to support
their claims:

George Kondos - part owner of Plaintiff LACONIA PROPERTIES LLC.

Michael J. Katos - part owner of Plaintiff LACONIA PROPERTIES LLC.

Warren W. Cronacher, P.E./Neil Schmelkin, P.E./(TAUSCHER CRONACHER PROFESSIONAL
ENGINEERS, P.C.)

265 Sunrise Highway, Suite 33

Rockville Center, New York 11570

B. ***Documents in Support of Plaintiff's Claims***

Plaintiff attaches hereto, and marks collectively as Exhibit "A", an "Engineer's Inspection Report"
prepared for Plaintiff by TAUSCHER CRONACHER PROFESSIONAL ENGINEERS, P.C., aerial
photographs of the *locus in quo*, a copy of a sales "flyer" containing a photograph of the *locus in
quo*, and correspondence from TAUSCHER CRONACHER PROFESSIONAL ENGINEERS, P.C.
to Plaintiff, dated January 8, 2007.

C. **Computation of Damages**

Plaintiff attaches hereto, and marks as Exhibit "B", a December 15, 2006 "spreadsheet" detailing \$219,081.92 in initial expenses/damages incurred by Plaintiff; an additional \$29,415.00 in payable losses/expenses, less unrelated expenses in the amount of \$20,000.00, and \$114,941.00 in rents lost by Plaintiff from July to December 2006, for a total loss of \$343,437.92, which amount Plaintiff claims as damages in the within action. Plaintiff reserves the right to supplement and or amend this response as additional expenses, either not yet known or not yet incurred, become known to Plaintiff.

D. **Disclosure of Insurance Information**

Plaintiff attaches hereto, marks as Exhibit "C", a copy of the policy of insurance issued by Defendant to Plaintiff for coverage for the *locus in quo* in this action, providing coverage on the date this cause of action arose.

Dated: White Plains, New York
September 27, 2007

NESCI KEANE PIEKARSKI
KEOGH & CORRIGAN, ESQS.

by: JASON M. BERNHEIMER (JB9566)
Attorneys for Plaintiff
Office & P. O. Address
245 Main Street - Suite 600
White Plains, New York 10601
(914) 993-6200
File No. 06-159/216569

TO: SPEYER & PERLBERG, ESQS.
Attorneys for TRAVELERS PROPERTY CASUALTY
COMPANY OF AMERICA a/k/a
ST. PAUL TRAVELERS INSURANCE
Office & P. O. Address
115 Broadhollow Road
Melville, NY 11747
(631) 673-6670

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

=====X

LACONIA PROPERTIES LLC.,

Plaintiff,

Index No. 07 CV 6220 (LAP)

-against-

RULE 7.1 DISCLOSURE

TRAVELERS PROPERTY CASUALTY COMPANY
OF AMERICA a/k/a ST PAUL TRAVELERS
INSURANCE COMPANY,

Defendants.

=====X

Plaintiff, LACONIA PROPERTIES LLC., through their attorneys, ***NESCI KEANE
PIEKARSKI KEOGH & CORRIGAN, ESQS.***, submits as and for an initial disclosure pursuant to
Fed. R. Civ. P. 7.1 as follows:

Plaintiff Laconia Properties, LLC, is owned by the following Partners:

Michael Demetriou

James Costaras

V & V Scoufaras Partners
23-32 26th Street
Astoria, NY 11105

John Keriazes

George Kondos

E & A Associates
128 South Road
Stanfordville, NY 12581

Katos 2000
128 South Road
Stanfordville, NY 12581

Michael J. Katos

Dated: White Plains, New York
September 27, 2007

NESCI KEANE PIEKARSKI
KEOGH & CORRIGAN, ESQS.

by: JASON M. BERNHEIMER (JB9566)
Attorneys for Plaintiff
Office & P. O. Address
245 Main Street - Suite 600
White Plains, New York 10601
(914) 993-6200
File No. 06-159/216569

TO: SPEYER & PERLBERG, ESQS.
Attorneys for TRAVELERS PROPERTY CASUALTY
COMPANY OF AMERICA a/k/a
ST. PAUL TRAVELERS INSURANCE
Office & P. O. Address
115 Broadhollow Road
Melville, NY 11747
(631) 673-6670

JASON M. BERNHEIMER
Notary Public, State of New York
No. 02BE6019121
Qualified in Westchester County
Commission Expires February 1, 2011